

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA,

-VS-

WILLIE HARRIS,

Defendant.

**DEFENDANT'S PRE-TRIAL
SUBMISSIONS**

14-CR-6149EAW

The Defendant, by and through his attorney, BRYAN S. OATHOUT, ESQ., hereby files his Pre-trial submissions per the Court's request.

Trial Attorney

Bryan S. Oathout, Esq. 30 West Broad Street, Suite 400, Rochester, NY 14614.

Defendant

Willie Harris, Livingston County Jail, 4 Court Street, Geneseo, New York 14454

Exhibit List

None at this time. The defendant reserves the right to file an exhibit list with the Court at a later date closer to trial.

Impeachment of Witnesses Under the Federal Rules of Evidence 608/609

To date the defendant has not received any information relating to the potential government witness's Andrew Ashton, Todd Czebatol, Barry Couch, Charles Facticeau, Richard Hoepfl, Kathy King, Michael Preisser, M. Dixon Robin, Thomas Rodwell, Jaime Torres, and Brian Tucker. To the extent any of these individuals have prior criminal convictions; defense counsel reserves the right to file notice of any intent to impeach the potential witness's under Federal Rules of Evidence 608 and 609.

Dated: February 27, 2016
Rochester, New York

Respectfully submitted,

/s/Bryan S. Oathout

BRYAN S. OATHOUT, ESQ.

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